

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

NATHAN ROBERTS, et al.,

*Plaintiffs,*

v.

PROGRESSIVE PREFERRED  
INSURANCE COMPANY, et al.,

*Defendants.*

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No. 1:23-cv-01597

Hon. Patricia A. Gaughan

Mag. Judge James E. Grimes, Jr.

**MOTION FOR THE ADMISSION *PRO HAC VICE* OF WILLIAM A. JACOBSON**

Pursuant to Local Civil Rule 83.5(h), The Equal Protection Project of the Legal Insurrection Foundation by and through one of their attorneys, Robert J. Gargas, a member of good standing of the bar of this court, respectfully moves this Court for an Order admitting William A. Jacobson *pro hac vice* as counsel on behalf of *amicus curiae* The Equal Protection Project of the Legal Insurrection Foundation in the above-captioned matter. Mr. Jacobson's contact information is as follows:

William A. Jacobson  
The Equal Protection Project of the Legal Insurrection Foundation  
18 Maple Avenue 280  
Barrington, RI 02806  
Telephone: (401)246-4192  
contact@legalinsurrection.com

Mr. Jacobson is an attorney in good standing for the New York state bar, having been admitted on January 30, 1985. His State of New York bar number is 1971225. He has never been disbarred or suspended from practice before any court, department, bureau or commission of any State or the United States. He has never received a reprimand from any such court, department, bureau, or commission pertaining to conduct or fitness as a member of the bar. A Certificate of

Good Standing is filed herewith. The undersigned is tendering the required \$120.00 filing fee with this Motion.

WHEREFORE, The Equal Protection Project of the Legal Insurrection Foundation respectfully requests that this Court grant attorney William A. Jacobson limited admission to appear in this Court, in this particular proceeding.

Date: March 28, 2024

Respectfully submitted,

/s/ Robert J. Gargas  
Robert J. Gargas  
Gargas Co. L.P.A.  
1670 Cooper Foster Park Rd  
Lorain, OH 44053  
Telephone: (440)960-1670  
rjgargas@gmail.com  
(SC# 0007136)

**CERTIFICATE OF SERVICE**

I certify that, on March 28, 2024, I electronically transmitted the attached MOTION FOR THE ADMISSION *PRO HAC VICE* OF WILLIAM A. JACOBSON and its accompanying Certificate of Good Standing using the CM/ECF system. Notice of Electronic Filing will be sent to all CM/ECF registrants for this matter.

/s/ Robert J. Gargasz

Robert J. Gargasz

Gargasz Co. L.P.A.

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Lorain, OH 44053

Telephone: (440)960-1670

rjgargasz@gmail.com

(SC# 0007136)



*Appellate Division of the Supreme Court  
of the State of New York  
Third Judicial Department*

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*I, Robert D. Mayberger, Clerk of the Appellate Division of the Supreme Court of the State of New York, Third Judicial Department, do hereby certify that*

*William A. Jacobson*

*was duly licensed and admitted to practice as an Attorney and Counselor at Law in all the courts of this State on **January 30, 1985**, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors at Law on file in this office, is duly registered with the Office of Court Administration, and according to the records of this Court is currently in good standing as an Attorney and Counselor-at-Law.*



*In Witness Whereof, I have hereunto set  
my hand in the City of Albany on  
March 25, 2024.*

*Robert D Mayberger*

*Clerk of the Court*





*State of New York  
Supreme Court, Appellate Division  
Third Judicial Department  
Admissions Office  
P.O. Box 7350, Capitol Station  
Albany, NY 12224-0350*

*Robert D. Mayberger  
Clerk of the Court*

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(518) 471-4778*

*Anthony A. Moore  
Director of Attorney  
Admissions*

To Whom It May Concern:

An attorney admitted to practice by this Court may request a certificate of good standing, which is the only official document this Court issues certifying to an attorney's admission and good standing.

An attorney's registration status, date of admission and disciplinary history may be viewed through the attorney search feature on the website of the Unified Court System.

New York State does not register attorneys as active or inactive.

An attorney may request a disciplinary history letter from the Attorney Grievance Committee of the Third Judicial Department.

Bar examination history is available from the New York State Board of Law Examiners.

Instructions, forms and links are available on this Court's website.

Robert D. Mayberger  
Clerk of the Court